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Before the  
Federal Communications Commission  
Washington, D.C. 20554  
FCC Docket No. 93-119  
General Docket No. 93-40

JUN 14 1993

FCC-1993-001-1

In the Matter of

) FCC Docket No. 93-119  
) General Docket No. 93-40

4 **Point to point requirements provide protection**

We note that limiting secondary use by the ARS to coordinated point to point operation will provide significant protection to the Automated Maritime Telecommunications Systems (AMTS). We support this requirement as a reasonable means to provide protection to the primary user of the band.

5 **Protection of Broadcast TV channel 13**

Unlike other services, where the operators are unfamiliar with the technical characteristics of transmission equipment, ARS operators are technically sophisticated. Operators in the ARS have extensive experience with operation on frequencies close to TV Broadcast channels. Operation on the 50 MHz ARS band has largely not caused problems with the adjacent broadcast channel 2. ARS operators are aware of, and employ the use of various technical methods to reduce or eliminate this problem.

6 **Appropriate types of modulation**

In this proceeding the Commission invited comment upon the modulation types to be allowed. TERAC believes that, within limits, the restriction of modulation types is not warranted to control interference. Clearly the use of pulse, or other ultra wide band modes is inappropriate in the proposed band. However the spectrum characteristics of digital and voice modulation types are virtually identical with regard to interference potential. We therefor believe that special restrictions differentiating between digital and analog techniques are not warranted.

7 **Local coordinators dedicated to prevent interference on 219-220 MHz**

Coordination to prevent interference is the fundamental purpose of ARS frequency coordinators. We can therefor state that all ARS frequency coordinators are ready and willing to assist the AMTS service when a local contact to prevent or eliminate interference is required. Local frequency coordinators are experienced in the propagation characteristics, coverage area and protection requirements in the various geographical areas of the country. With the assistance of local frequency coordinators, the potential for interference will be non-existent.

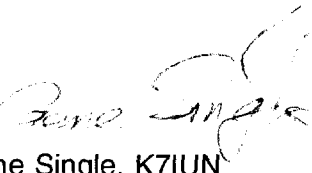
8 **Single point of contact**

We note that the AMTS has requested a single point of contact which would be responsible for protection of proprietary coordination information possessed by the AMTS service. ARS coordinators have similar requirements. we understand and concur with the desire to protect confidential information.

9 **Mechanisms to utilize local coordinator resources are in place and functioning**

As part of a program to support frequency coordinator participation at a regional level, the ARRL some time ago established an 800 number Bulletin Board System for frequency coordinator use. The system has built in mechanisms to protect frequency coordination information. This existing system is in place, functioning and is able to provide rapid communications between the local frequency coordinators and ARRL. ARS requests for coordination can be processed in an expeditious manner, while providing protection for the primary user of the band. The system will facilitate the utilization of local coordination resources to insure protection of the primary AMTS users of the 219-220 band.

Respectfully submitted,  
The TEchnology Radio Amateur Club

By   
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